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2017 JUN 21 PM 4:18

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

IC LINK INDUSTRIES, LTD.,  
MOHAMMAD KHAZRAI SHANEIVAR,  
AREZOO HASHEMNEJAD ALAMDARI,  
and PARISA MOHAMADI,  
aka PARISA JAVIDI,

Defendants.

CASE NO. 1:17 CR 236

JUDGE NUGENT

MOTION TO SEAL INDICTMENT

Now comes the United States of America, by and through counsel, David A. Sierleja, Acting United States Attorney, and Michelle M. Baeppler, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reasons: the defendants are currently located in a foreign country, and should the defendants learn of the indictment filed against them, they could reasonably be expected to cancel any planned travel to the United States and remain fugitives in a foreign country.

The government further requests that the indictment remain sealed, with the exception that the indictment is unsealed for the limited purpose of disclosing the existence or disseminating the indictment to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendants

or to secure the defendants' arrests, extraditions, or expulsions, or as otherwise required for purposes of national security.

The government further requests this Court to order that an Assistant United States Attorney of the Criminal Division of the United States Attorney's Office for the Northern District of Ohio may obtain, upon request, a certified copy of this indictment should any defendant be located in another judicial district and a certified copy of this indictment is needed for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

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Acting United States Attorney

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